

# GLENN AGRE BERGMAN & FUENTES

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## **VIA ECF ONLY**

Hon. Brian M. Cogan, U.S.D.J.  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Full Circle United, LLC v. Bay Tek Entm't, Inc.*, No. 1:20-cv-03395-BMC

Dear Judge Cogan:

We write on behalf of plaintiffs Full Circle United, LLC and Eric Pavony (together, “Full Circle”), regarding the Premotion Conference before Your Honor scheduled for November 29, 2022, at 10:00 a.m.

The Court’s Scheduling Order setting the Premotion Conference states that “the Court will address the proposed motions for summary judgment,” and “the Court also plans to address and rule on any other outstanding issues that the parties still need resolved before they engage in additional motion practice.” (August 10, 2022 Scheduling Order.)

Full Circle writes to respectfully inquire whether the Court intends to hear oral argument on any outstanding motions or objections to the Special Master’s reports and recommendations other than Defendant-Counterclaim Plaintiff Bay Tek Entertainment, Inc.’s proposed motion for summary judgment, as listed in the parties’ joint letter and Full Circle’s letter providing an update as to outstanding motions (Dkt. Nos. 130, 140), and if so, whether there are any outstanding motions in particular that the parties should focus on.

Full Circle thanks the Court for its time and consideration of these matters and looks forward to the Premotion Conference.

Respectfully,

/s/ Reid Skibell  
Reid Skibell